

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABBY B. CONLEY,

Plaintiff

JURY TRIAL DEMANDED

v.

COUNTY OF ERIE, ERIE COUNTY OFFICE
OF CHILDREN AND YOUTH, a/k/a ERIE
COUNTY CHILD WELFARE SERVICE,
RICHARD SCHENKER, individually and in
his capacity as County Executive of Erie
County, Pennsylvania, PETER CALLAN,
individually and in his capacity as Erie County
Director of Personnel, DEBRA LIEBEL,
individually and in her capacity as Executive
Director, Erie County Office of Children and
Youth, a/k/a Erie Child Welfare Service and
JOHN A. ONORATO, ESQUIRE, individually
and in his capacity as Erie County Solicitor,

Civil Action No.: 05-76E

The Honorable Sean J. McLaughlin

Defendants

CERTIFICATE OF COMPLIANCE

1. On July 29, 2005, the undersigned counsel for Defendant John A. Onorato served counsel for Plaintiff Abby B. Conley with Interrogatories and Requests for Production of Documents directed to the Plaintiff relative to the above case.
2. On September 8, 2005, the undersigned counsel sent counsel for Plaintiff correspondence requesting answers to the Interrogatories and Requests for Production of Documents.
3. On September 20, 2005, the undersigned counsel received Plaintiff's purported responses.

4. By letter dated September 23, 2005, the undersigned counsel attempted to obtain complete answers to Interrogatories and responses to the Request for Production of Documents.

5. Plaintiff's counsel provided further explanation for the failure to respond by letter dated October 5, 2005.

6. The undersigned counsel made a good faith attempt to confer with Plaintiff's counsel in an effort to obtain full and complete discovery responses without court action.

Respectfully Submitted:

DELL MOSER LANE & LOUGHNEY, LLC

/s/ Mark R. Lane, Esquire

Mark R. Lane, Esquire

Pa. I.D. No. 61923

Attorneys for Defendant, John A. Onorato, Esquire

JURY TRIAL DEMANDED

525 William Penn Place, Suite 3700

Pittsburgh, PA 15219

(412) 471-1180

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **Certificate of Compliance** has been served upon all counsel of record by U.S. Mail, postage prepaid, this **2nd** day of **December, 2005**, as follows:

Anthony Angelone, Esquire
Vendetti & Vendetti
3820 Liberty Street
Erie, PA 16509
Counsel for Plaintiff

Timothy D. McNair, Esquire
Law office of Timothy D. McNair
821 State Street
Erie, PA 16501
Counsel for Plaintiff

Edmond R. Joyal, Esquire
Gigler & Joyal
612 Frick Building
437 Grant Street
Pittsburgh, PA 15219
Counsel for County of Erie, et al.

/s/ Mark R. Lane, Esquire
Mark R. Lane, Esquire
Attorney for Defendant,
John A. Onorato, Esquire